

August 9, 1999

Dockets Management Branch (HFA-305) 1019 99 AUG 16 A 9:56
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Docket Nos. **98N-1230, 96P-0418, and 97P-0197**

People for the Ethical Treatment of Animals (**PETA**) is an international nonprofit organization with over 600,000 members dedicated to ending animal suffering. Please accept the following comments on behalf of our members regarding the docket numbers listed above.

The Food and Drug Administration (FDA), in its proposed rule, acknowledges that "salmonellosis is a serious health concern" and immediate action is needed due to the high number of "outbreaks of foodborne illnesses and deaths caused by *salmonella enteritidis* (Se) that are associated with the consumption of shell eggs." The two proposed actions ("safe handling" warning labels on egg cartons and regulation of egg refrigeration temperatures), however, are not adequate in ensuring that consumers are safeguarded from Se contamination.

A recent report by the U.S. General Accounting **Office** concludes that "to refrigerate eggs at 45 degrees Fahrenheit or below.. may not, for a variety of reasons, effectively reduce egg safety risks." The same report calls for the FDA to "establish prevention-based procedures on egg farms."² One such procedure would prove to be highly effective in decreasing the frequency and severity of Se infections in eggs: The elimination of induced (or forced) molting practices for egg-laying hens.

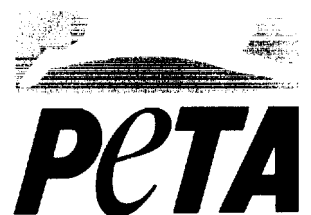
A recent U.S. Department of Agriculture (USDA) study concludes that induced molting increases the frequency and severity of Se infections of a flock, regardless of an individual hen's **age**.³ In fact, induced molting "could conceivably alter the Se situation in a flock **from** a minor problem involving a small number of birds to one where a large number of birds [are] **affected**."⁴

¹ U.S. General Accounting **Office** (Lawrence J. Dyckman, Director, Food and Agriculture Issues Resources, Community and Economic Development Division). "U.S. Needs a Consistent Farm-to-Table Approach to Egg Safety." GAO/T-RCED-99-232; Jul. 1, 1999.

² *Ibid*, p.2.

³ U.S. Department of Agriculture, Agricultural Research **Service** (Holt, Peter S. & Robert E. Porter, Jr.). "Effect of Induced Molting on the Course of Infection and Transmission of *Salmonella enteritidis* in White Leghorn Hens of Different Ages." *Poultry Science*, 71:1842-1848; 1992.

⁴ *Ibid*, p. 1847.



**PEOPLE FOR THE ETHICAL
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Similarly, a study from the University of Florida finds that stress caused by an induced molt significantly compromises the immune system of laying hens, resulting in higher levels of Se infections.⁵ Furthermore, the study concludes that induced molting is detrimental to the Se rate of the entire flock: “Molted birds shed significantly higher numbers of Se during a forced molt as compared to unmolted birds.. . and [induced molting] causes an increase in the transmission of Se to uninfected hens housed in adjacent cages.”⁶

Clearly, the most effective and direct way to reduce Se infections in humans is to control outbreaks in egg-laying flocks, which transmit the infection to their eggs. This is reinforced by a study presented by a veterinarian and a medical doctor at a 1998 American Veterinary Medical Association symposium on food safety, “control of Se [in humans] will require preventing infections in egg-laying.. . chickens.” Again, the solution is simple: Eliminate induced molting practices. The Food Safety and Inspection Service (FSIS) agrees, “to reduce human illnesses cause by Se, FSIS is encouraging poultry and egg producers to eliminate forced molting practices and adopt alternatives that reduce public health risks.”⁸

In the proposed rule, the FDA states that “the ideal solution to this public health problem would be to adopt measures to eliminate viable Se in shell eggs.” We urge the FDA to use its jurisdiction to eliminate a farm practice that is injurious to both animal and human health by banning the practice of induced molting across the country.

Thank you for the opportunity to comment.

Sincerely,



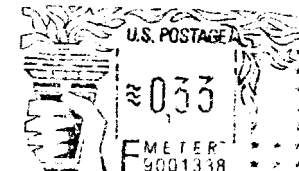
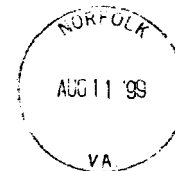
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⁵ University of Florida (Butcher, Gary D., D.V.M., Ph.D. & Richard Miles, Ph.D.). “Salmonella control and Molting of Egg-Laying Flocks-Are they Compatible?” Fact Sheet VM 92; Jul. 1994.

⁶ *Ibid*, p. 2.

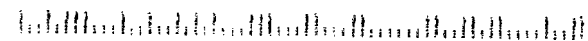
⁷ Angulo, Frederick J. & David L. Swerdlow. “*Salmonella Enteritidis* Infections in the United States.” Journal of the American Veterinary Medical Association, Vol. 213, No. 12: Dec. 15, 1998.

⁸ Patricia Stolfa, Acting Director, Regulations Development and Analysis Division, Office of Policy, Program Development and Evaluation, FSIS, USDA. Correspondence dated 8/21/98.



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CROSS FILE SHEET

File Number:

98N-1230/ C198

See File Number:

97P-0197/ C194

96P-0418/ C198